

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

In Re:)	
)	NO. 15-07365
THERESA WHITE-PRICE,)	
)	
)	Chapter 13
Debtor)	
)	
)	
)	Honorable Judge Carol A. Doyle
)	

NOTICE OF AMENDED MOTION

TO: All Creditors Listed on Attached Service List. (via U.S. Mail)

PLEASE TAKE NOTICE that on May 10, 2016 at 9:30 a.m., the undersigned will appear before the Honorable Carol A. Doyle at the Dirksen Federal Courthouse, 219 S. Dearborn, Chicago Illinois Courtroom 742 and will then and there present the attached **Debtor's Motion to Modify Plan Pursuant to 11 USC §1329**, at which time you may appear if you so choose.

Certificate of Service

I, Penelope N. Bach, hereby certify that I caused to be served, electronically via U.S. Mail to all creditors listed on the attached service list, and attached a copy of the forgoing NOTICE and MOTION upon the parties named above on April 12, 1016, from the office located at 900 Jorie Blvd., Ste 150, Oak Brook, IL 60523.

BY: /S/ PENELOPE N. BACH
SULAIMAN LAW GROUP, LTD.
COUNSEL FOR DEBTOR(S)
900 JORIE BOULEVARD, SUITE 150
OAK BROOK, IL 60523
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ATTORNEY NO: 6284659

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DEBTOR'S MOTION TO MODIFY CHAPTER 13 PLAN

NOW COMES, Theresa White-Price ("Debtor"), by and through her attorneys, Sulaiman Law Group, Ltd., and pursuant to 11 U.S.C. §1329 requesting this Court to Modify The Debtor's Confirmed Chapter 13 Plan, and in support of this motion states as follows:

1. The instant bankruptcy proceeding was filed under Chapter 13 of the Bankruptcy Code on March 3, 2015.
2. This Honorable Court confirmed the Debtors' Chapter 13 Plan on August 25, 2015 ("Confirmed Plan").
3. Debtor's Confirmed Plan requires the Debtor to make plan payments to the Chapter 13 Trustee in the amount of \$2,581.00 for twelve months then \$2,712.00 per month for forty-eight months. *See* attached Exhibit A is a true and accurate copy of Debtor's Confirmed Plan.
4. In Section H of Debtor's Confirmed Plan, the Debtor was to pay 100% to her General Unsecured Creditors. *Id.*
5. The confirmed plan proposes to pay Trustee Fees, Current Mortgage Payments, Attorney fees, Mortgage Arrears and priority claims which total \$146,368.23.

6. The Confirmed plan also proposes to pay general unsecured creditors the amount of \$14,750.08.

7. Debtor's claims register shows that Debtor is paying three unsecured creditors IRS, Commonwealth Edison and Nicor. With this Motion, Debtor is also filing an objection to proof of claims filed by Commonwealth Edison and Nicor.

8. If the Court sustains these objections, the only unsecured creditor is the IRS for the amount of \$16.61.

9. If the Court should overrule the objections, Debtor is faced with an unfeasible plan. As Debtor's plan was based upon the idea that with Debtor's completed education she would be able to find full time employment. A forecasted salary of \$4,958.00 was entered into Schedule I. This income has not come to fruition.

10. Debtor's real income is \$4,463.94 which leaves her an disposable monthly income of \$2,010.00. Therefore, the Debtor is unable to make the increased payments as proposed by the confirmed Chapter 13 Plan.

11. Debtor proposes to decrease her plan payment to \$2,010.00 a month and to reduce the percentage to general unsecured creditors to 0%.

12. No secured or priority creditor will be prejudiced by the decrease in Plan payments.

13. Creditors will receive more with the modified payment than they would receive if this case was dismissed or converted to a Chapter 7 case.

WTHEREFORE, the Debtor prays this Honorable Court for the following relief:

- A. Debtor's Plan is amended to decrease Debtor's monthly payment to \$2,010.00 per month and general unsecured creditors to be paid 0%;
- B. Debtors' default is deferred to the end of the plan; and
- C. For such other and further relief this Court deems just and proper.

Dated: April 12, 2016

Respectfully Submitted,

BY: /S/ PENELOPE N. BACH
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